

Session 2



Questions we will answer during this session:

How do you determine if a student is eligible for Title IV aid?

How do you obtain a student's financial aid history?

Program-Specific Student Eligibility Criteria

Program	Who is Eligible?	Criteria
Federal Pell Grant	<ul style="list-style-type: none"> Undergraduates only May not have bachelor's or first professional degree (except for students seeking teacher certification at schools not offering undergraduate degrees in education) 	<ul style="list-style-type: none"> Students must have a SAR or ISIR on file with the school Less-than-full-time, including less-than-half-time, students are eligible
FSEOG	<ul style="list-style-type: none"> Undergraduates only May not have bachelor's or first professional degree 	<ul style="list-style-type: none"> Must be awarded first to students with exceptional financial need (that is, lowest EFCs) Priority to students with exceptional financial need who are eligible for Federal Pell Grants
Federal Perkins Loan	<ul style="list-style-type: none"> Undergraduates Graduate students Professional students 	<ul style="list-style-type: none"> Priority to students with exceptional financial need (as defined by the school) Students must be willing to repay their loans Must have determination of Federal Pell Grant eligibility May not be in medical internship or residency
FWS	<ul style="list-style-type: none"> Undergraduates Graduate students Professional students 	<ul style="list-style-type: none"> See comments below for "FSEOG, Federal Perkins Loan, and FWS"
FSEOG,* Federal Perkins Loan, and FWS	<ul style="list-style-type: none"> Undergraduates only* Graduate students Professional students 	<ul style="list-style-type: none"> Demonstrate need according to Federal Need Analysis Methodology Less-than-full-time students are eligible <ul style="list-style-type: none"> A "reasonable share" of a school's allocation of campus-based funds must be awarded to less-than-full-time students and nontraditional students
Federal Subsidized Loan and Federal Direct Subsidized Loan	<ul style="list-style-type: none"> Undergraduates Graduate students Professional students Students enrolled in courses prerequisite to enrollment in a degree or certificate program Students enrolled in a teacher certification program 	<ul style="list-style-type: none"> Students must: <ul style="list-style-type: none"> Be enrolled at least half time Demonstrate financial need according to the Federal Need Analysis Methodology Eligibility for Federal Pell Grants must be determined prior to certifying loan applications and, if eligible, students must apply for Federal Pell Grants
Federal Unsubsidized Loan and Federal Direct Unsubsidized Loan	<ul style="list-style-type: none"> See Federal Subsidized Loan and Federal Direct Subsidized Loan 	<ul style="list-style-type: none"> Students do not have to demonstrate financial need Student eligibility for Federal Pell Grant and Federal Subsidized or Federal Direct Subsidized must be determined Students must apply for Federal Subsidized or Federal Direct Subsidized first; EFA includes subsidized loan amount for which students are eligible Students must be enrolled at least half time
Federal PLUS Loan and Federal Direct PLUS Loan	<ul style="list-style-type: none"> Parents of eligible dependent undergraduate students 	<ul style="list-style-type: none"> Students for whom parents borrow must be eligible, regular students enrolled at least half time Parents must: <ul style="list-style-type: none"> Meet same citizenship requirements as an eligible student Not be in default on a Title IV loan Not owe an overpayment on a Title IV grant or loan Not have an adverse credit history

How do you determine if a student is eligible for Title IV?

General Student Eligibility Checklist

YES	NO	(Checked box indicates answer required for student to be eligible for Title IV.)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1. Does the student have a valid Social Security number? (Question 8 on paper FAFSA; SSA match results on ISIR)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	2. Is the student a U.S. citizen or eligible noncitizen? (Questions 14-15 on paper FAFSA; INS match results on ISIR).
<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Is the student a "regular student" enrolled or accepted for enrollment in an "eligible program" for the purpose of obtaining a degree or certificate? (Questions 30-31 on paper FAFSA).
<input checked="" type="checkbox"/>	<input type="checkbox"/>	4. Does the student meet the academic qualifications for study at the postsecondary level? (Student has a high school diploma or recognized equivalent [such as a GED] or is beyond the age of compulsory school attendance, has passed an ability-to-benefit [ATB] test, or followed a state-prescribed process.) (Question 32 on paper FAFSA).
<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. Has the student registered with Selective Service (if applicable)? (Questions 28-29 on paper FAFSA).
<input type="checkbox"/>	<input checked="" type="checkbox"/>	6. Is the student enrolled solely in remedial coursework?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	7. Is the student maintaining satisfactory academic progress?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	8. Is the student in default or does the student owe an overpayment on a Title IV loan or grant? (NSLDS history on ISIR)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	9. Has the student borrowed in excess of loan limits? (NSLDS history on ISIR).
<input type="checkbox"/>	<input checked="" type="checkbox"/>	10. Is the student a member of a religious order, an incarcerated student, or enrolled in a correspondence course that is not part of an eligible program?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	11. Does the student have financial need (except for some loan programs where need is not necessary)?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	12. Was the student's financial aid history obtained from NSLDS or (if necessary) the school (or schools) previously attended by the student?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	13. Has verification been completed (if required)?

(All Handbook Highlights from *SFA Handbook: Student Eligibility*)

VALID SOCIAL SECURITY NUMBERS

To be eligible to receive SFA funds, each student must provide a valid Social Security Number (SSN). The Social Security Administration (SSA) and the CPS work together to conduct a match that verifies that the given student's SSN is correct and that the SSN corresponds to the given student's name and birth date.

As is the case for the SSA citizenship match, no comment is provided on the output document when the SSN match is successful. A match flag of "4" will be provided in the FAA Information Section for a successful match. If the school discovers that a matched SSN is incorrect or discovers conflicting information about the student's SSN, the school must resolve the conflict before disbursing SFA funds to the student.

If a student's name and SSN match but the SSA shows a different date of birth, a comment stating that the date of birth is inconsistent will appear on the student's output document (Comment 60).

If the SSN is in the database but there is a discrepancy regarding the student's name, the student will receive a comment on the output document telling the student either to correct the appropriate items or to contact the SSA to resolve the problem (Comment 61). This situation is most likely to occur when a student has used a nickname on the application or when a student has failed to inform the SSA of a name change (from marriage, for instance). The school may disburse funds if the student provides documentation explaining the discrepancy, and shows that the submitted SSN is correct; the application does not need to be resubmitted to the CPS.

If the SSN does not match, the student's application will be rejected. The student will receive a comment that instructs the student to correct his or her SSN or contact SSA if he or she believes the SSN reported is correct (Comment 24).

If the student's application is rejected because he or she reported an incorrect SSN, the student should submit a correction to have the new (correct) SSN matched again with the SSA. If the application is missing either the last name or the date of birth, no match with SSA will be conducted, and the student's application will be rejected.

If no match was conducted due to processing problems, the CPS will check to see whether the reported SSN falls within a valid range. If it does, the student will receive a comment telling the student to provide proof to the school that the SSN is correct (Comment 58). If there was no match because of processing problems and the SSN does not fall within a valid range, the student's application will be rejected.

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ABILITY-TO-BENEFIT

On December 1, 1995, the Secretary published regulations for approving and administering ATB tests. The regulations took effect July 1, 1996. On October 25, 1996, the Department published the first list of approved tests under these rules in a *Federal Register* notice. See pages 2-16 and 2-17 for a list of approved tests. To be sure that you have a comprehensive up-to-date list, you may call Customer Support at 1-800-433-7327 for information on tests approved after this publication went to print. If it chooses to do so, a school may use more than one of the tests on the list to determine whether an ATB student is eligible to receive SFA program funds.

There are some areas in which there are no “new” approved tests; in these cases schools can still use the old approved tests until 60 days after the Department publishes the name and score of the new test. Specifically, the regulations contain additional provisions for approving tests for students whose native language is not English and who are not fluent in English and for students who have disabilities; no such tests have been approved. In such cases schools should make ATB eligibility determinations based on guidelines stated in the December, 30, 1992 *Federal Register* and by using tests approved as of June 30, 1996. The Department is currently reviewing the eight tests listed in the October 25 notice to determine if they can also be used for students with disabilities. If the Department approves the tests for this purpose, a notice will be published in the *Federal Register*. When published, this notice will also be available at <http://ifap.ed.gov>.

The regulations also specify testing procedures a school must follow. The school should make arrangements with one or more parties to administer the approved tests to students. The regulations require that the test administrator be certified by the test publisher. The school should contact the test publisher to locate a certified test administrator. Certified administrators may come from various occupations. They may include but are not limited to people in these fields:

- high school guidance counselors;
- qualified professional educators;
- regional and area Armed Forces Command staff who are experts in education, training, and human resource development;
- test and measurement experts; and
- human resource development professionals.

An approved test must be independently administered. To be independently administered, the test must be given by an individual or by an organization with no current or prior financial or ownership interest in the school, its affiliates, or its parent corporation other than the interest generated through its agreement to administer the approved test. A test is also considered to be independently administered if it is given at an assessment center.

Tests Approved by the Department

Following is a listing of the eight approved ability-to-benefit (ATB) tests and the publishers of these tests. The list is based on information originally printed in the *Federal Register* on October 25, 1996. Call ED's Customer Service number at 1-800-433-7327 for information on tests approved after this publication went to print.

- ◇ ASSET Program: Basic Skills Tests (Reading, Writing, and Numerical Skills): Forms B2 or C2. Approved passing scores: Reading (34), Writing (34), Numerical Skills (33). Used primarily by community/technical colleges. Paper/pencil testing. Hand score or computer score.

Publisher: American College Testing (ACT)
Placement Assessment Programs
2201 North Dodge Street
P.O. Box 168
Iowa City, Iowa 52243

Phone: 319-337-1054

- ◇ Career Programs Assessment (CPAt) Basic Skills Subtests (Language Usage, Reading, and Numerical Skills): Forms A, B, or C. Approved passing scores: Language Usage (43), Reading (44), Numerical Skills (42). Used primarily by proprietary career schools and colleges. Paper/pencil testing. Hand score only.

(Publisher: American College Testing [ACT]. See information in prior listing.)

- ◇ COMPASS Subtests: Prealgebra/Numerical Skills Placement, Reading Placement, and Writing Placement. Approved passing scores: Prealgebra/Numerical Skills Placement (21), Reading Placement (60), and Writing Placement (31). Used primarily by community/technical colleges and 4-year colleges and universities. Computer testing only/computer scoring only.

(Publisher: American College Testing [ACT]. See contact information above.)

- ◇ Computerized Placement Tests (CPTs)/ACCUPLACER (Reading Comprehension, Sentence Skills, and Arithmetic). Approved passing scores: Reading Comprehension (52), Sentence Skills (60), and Arithmetic (36).

Publisher: The College Board
45 Columbus Avenue
New York, NY 10023-6992

Phone: 212-713-8000

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Tests Approved by the Department

- ◊ Descriptive Tests: Descriptive Tests of Language Skills (DTLS) [Reading Comprehension; Sentence Structure or Conventions of Written English]: Forms M-K-3KDT and M-K-3LDT; and Descriptive Tests of Mathematical Skills (DTMS) [Arithmetic]: Forms M-K-3KDT and M-K-3LDT. Reading Comprehension (108); Sentence Structure (9) or Conventions of Written English (309), and Arithmetic (506).

(Publisher: The College Board: See prior listing.)

- ◊ Test of Adult Basic Education (TABE) [Reading Total, Total Mathematics, Total Language]: Forms 5 and 6, Level A, Survey Version and Complete Battery Version. Approved passing scores: Reading Total (768), Total Mathematics (783), Total Language (714).

Publisher: CTB/McGraw Hill
20 Ryan Ranch Road
Monterey, CA 93940-5703

Phone: 408-393-7197

- ◊ Test of Adult Basic Education (TABE) [Reading, Total Mathematics, Language]: Forms 7 and 8, Level A, Survey Version and Complete Battery Version. Approved passing scores: Reading (559), Total Mathematics (562), Language (545).

(Publisher: CTB/McGraw Hill. See contact information above.)

- ◊ Wonderlic Basic Skills Test (WBST) [Verbal Forms VS-1 & VS-2; Quantitative Forms QS-1 & QS-2]. Approved passing scores: Verbal (200), Quantitative (210).

Publisher: Wonderlic Personnel Test
1509 N. Milwaukee Avenue
Libertyville, IL 60048-1380

Phone: 800-323-3742

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REGISTRATION WITH SELECTIVE SERVICE

Most males from age 18 through 25—including permanent residents and other eligible noncitizens—are required to register with the Selective Service System. Anyone required to register with Selective Service must have done so in order to receive aid through the SFA Programs. Persons exempted from this requirement include:

1. females;
2. males currently in the armed services and on active duty (this exception does not apply to members of the Reserve and National Guard who are not on active duty);
3. males who are not yet 18 at the time that they complete their applications (an update is not required during the year, even if a student turns 18 after completing the application);
4. males born before 1960; and
5. citizens of the Federated States of Micronesia, the Republic of the Marshall Islands, or the Republic of Palau.

There are certain less common situations in which the registration requirement is waived. Students who are not required to have already registered prior to meeting one of these criteria and who meet one of the criteria for the entire time they are 18 through 25 qualify for the waiver if:

1. they are unable to register due to being hospitalized, incarcerated, or institutionalized;
2. they are enrolled in any officer procurement program at The Citadel, North Georgia College, Norwich University, or Virginia Military Institute;
3. they are commissioned Public Health Service officers on active duty or members of the Reserve of the Public Health Service; or
4. they are commissioned officers of the National Oceanic and Atmospheric Administration.

If the student qualifies for an exemption or waiver, and thus is not required to register, the school must document the student's status. If the student is not clearly exempt from the requirement to register, the school should ask the student to document the exemption by providing the school with a Status Information Letter from the Selective Service.

SATISFACTORY ACADEMIC PROGRESS

A school's satisfactory progress policy for students receiving SFA funds must be at least as strict as the policy used for students who do not receive SFA funds. The policy must be applied consistently to all SFA recipients within identifiable categories of students (such as full-time or part-time, graduate, or undergraduate students). Note that the school's satisfactory progress policy must include both a qualitative measure (such as the use of cumulative grade point average) and a quantitative measure (such as a maximum time frame for completion) of the student's progress.

Although a school may establish its own satisfactory progress standards, these standards must at least meet the minimums required by law and regulations. For the qualitative standard, the law specifies that by the end of the second academic year (measured as a period of time, not by the student's grade level), the student must, in general, 1) have a C average or its equivalent, or 2) have an academic standing consistent with the requirement for graduation from the program. If a school does not use letter grades, a school's satisfactory progress policy should define "equivalent of a C average." If a school determines that a student has maintained satisfactory progress standards even though his or her average falls below a C average, the school must be able to document that the student's average is consistent with the academic standards required for graduation. Rather than using a single fixed standard throughout the program, a school may use a graduated grade point requirement. For instance, a school may set a minimum grade point average (GPA) of 1.75 (on a scale of 0.0 to 4.0) at the end of the second academic year in a four-year degree program. The school may also require that a student earn at least a 2.0 average in order to graduate. If school policy permits progression toward the 2.0 graduation requirement, the school may permit a lower standard at the end of the second academic year.

To accurately measure a student's progress in a program, the satisfactory progress policy must also include a quantitative measure to determine the number or percentage of courses, credit hours, or clock hours completed. To quantify academic progress, a school must set a maximum time frame in which a student is expected to finish a program. For an undergraduate program, the maximum time frame may not exceed 150% of the published length of the program measured in academic years, academic terms, credit hours attempted, or clock hours completed, as appropriate.

To ensure that a student is making sufficient progress throughout the course of study, the school must divide the program into **equal** evaluation periods called increments. An increment may not be longer than half the program or one academic year, whichever is less. Once a school defines the length of each increment, the school must compare the number of hours the student attempted with the number of hours the student successfully completed. This calculation enables the school to determine whether the student is progressing at a rate that will allow him or her to finish the program within the maximum time frame.

Effect of Loan Status on Student Aid Eligibility		
Loan Status	NSLDS Code	Eligible for SFA Funds*
In school, grace period,	DA-Deferred FB-Forbearance ID-In school or grace period RP-In repayment	Yes
Paid	DP-Default, then paid in full PC-Paid in full through consolidation PF-Paid in full	Yes For consolidation, it does not matter what type of consolidation loan the borrower received, nor whether loan was in default before consolidation.
Lost guarantee	UI-Uninsured, Unreinsured	Yes It does not matter if the loan was in default.
Canceled or discharged	BC-No default, bankruptcy discharge CA-Canceled DF-Default, false certification discharge DG-Default, false certification (ability to benefit) discharge DI-Disability DJ-Default, discharged by judicial ruling DK-Default, bankruptcy discharge DN-Default, closed school discharge DS-Default, disability cancellation EA-False certification (ability to benefit) discharge EC-Closed school discharge EF-Loan discharged for fraudulent disbursement EJ-Court ordered write-off OD-Default, bankruptcy discharge	Yes For a borrower who had a disability cancellation to receive new loans, the borrower must have a doctor's certification that his or her condition has improved and sign a statement indicating that he or she is aware that the new loan cannot be canceled on the basis of any present impairment unless the condition deteriorates.
No default, bankruptcy filing	BK-No prior default, active bankruptcy claim	Yes Loan was not in default and has not been discharged.
Default	DL-Defaulted, in litigation DT-Defaulted, collection terminated DU-Defaulted, unresolved	No
Default, bankruptcy filing	DB-Defaulted, active bankruptcy claim DO-Defaulted, active bankruptcy claim	No, unless debtor can show that loan is dischargeable.
Default, compromise	DC-Defaulted, compromised	Yes Compromise is recognized as payment in full.
Default, written-off	DW-Defaulted, write-off	No, unless debtor reaffirms loan and makes satisfactory repayment arrangements or repays loan in full.
Default, satisfactory repayment arrangement	DX-Defaulted, satisfactory arrangements, and six consecutive payments	Yes, if borrower continues to comply with repayment plan or is granted forbearance.

*Federal Perkins Loan regulations allow the financial aid administrator to deny eligibility for additional loans if he or she has evidence that the applicant is unwilling to repay the loan.

How do you obtain a student's financial aid history?



The National Student Loan Data System (NSLDS)

- **Contains Title IV information & history**
- **Contains overpayment information for FSEOG, Pell, and Perkins**
- **Simplifies Student Status Confirmation Reporting (SSCR)**

FINANCIAL AID TRANSCRIPTS

The transcript information must include:

- *the student's name and Social Security Number.*
- *whether the student is in default on an NDSL, or Perkins Loan, or owes a repayment on a Federal Pell Grant, Perkins Loan, or FSEOG at that school.* The school should always be able to tell from its own records if the student is in default or owes a repayment for any of these programs.
- *if known, whether the student owes a repayment on an SSIG or is in default on a FFEL or Direct Loan received at that school.* In many cases, the holder of the debt (the guaranty agency, the state agency, or the Department) will have informed the school if the student is in default or owes a repayment.
- *for the award year in which the transcript is requested, the amount of Perkins funds disbursed.*
- *the total amount of any loans received by the student under the Perkins and NDSL programs at that school.*
- *whether the student had an outstanding balance on an NDSL (either Defense or Direct) from that school on July 1, 1987.* This will affect whether the student may be considered a new borrower in the Perkins Loan Program. New Perkins borrowers are given a nine-month grace period, rather than the six-month NDSL grace period and are eligible for a deferment or cancellation for volunteer service in the Peace Corps.
- *whether the student had an outstanding balance on an NDSL (either Defense or Direct) from that school on October 1, 1992.*
- *the amount and period of each loan made to the student under the FFEL and Direct Loan programs at that school.* This includes PLUS loans taken out by the student's parents on the student's behalf.
- *the student's Scheduled Pell Grant and the amount of Pell Grant funds disbursed to the student for the current award year.* Schools do not have to report information on FSEOG awards with the transcript information because annual FSEOG maximums apply only to the amount that the school may award during an award year, not to how much the student may receive from multiple schools.

When responding to an FAT request, a school is not required to include information about the amount of aid awarded at other schools or the student's default or overpayment status at other schools. However, the school sending the transcript must list these other schools with the transcript information, and the new school must make sure that it has received transcript information from those schools.

Four students have applied for federal financial aid. Each student has a different educational goal and wishes to attend a specific school. Determine each student's eligibility.

Student 1—Justin

Justin Case is a 21-year-old student enrolled in Foster Business College (FBC). Justin was born and raised in Guam, and he has spent the past 3 1/2 years working periodically on construction jobs. He now wants to take a six-month, 600-clock-hour course in computerized information management at FBC to obtain a professional certificate.

As Justin never finished high school, he took FBC's ability-to-benefit test (approved by ED) and scored a passing grade of 78. Justin received a Student Aid Report (SAR) with a Pell-eligible Expected Family Contribution (EFC). Justin indicates that he is not required to register with the Selective Service, as he is a conscientious objector. Justin was selected for verification, and he has promised the aid administrator that he will bring in the appropriate tax documents once his mother sends them to him.

Justin's Questions:

- 1. Am I eligible to receive Title IV financial aid at FBC?**
- 2. If not, which student eligibility criteria did I not meet, and what can I do, if anything, to become eligible for Title IV financial aid?**

Case Study

Student 2—Kay C.

Kay C. Fudd is a 17-year-old high school graduate from Springfield, IA , where she was born and raised.

State University, where she plans to attend, informs her that she needs to take a few remedial courses before she can enroll in their program. So, Kay enrolls at Dunn Community College for the summer term to take the remedial courses.

Kay C.'s Questions:

- 1. Am I eligible to receive Title IV financial aid at your school, Dunn Community College?**

- 2. If not, which student eligibility criteria did I not meet, and what can I do, if anything, to become eligible for Title IV financial aid?**

Student 3—Elena

Elena Del Castillo is a self-supporting 25-year-old student who is enrolled at Tower Community College (TCC) for the current award year. She is starting the second year of her occupational therapy course, which is a two-year degree program.

Elena was born in Puerto Rico and graduated from Notre Dame High School in Caguas, Puerto Rico. She attended Hall Technical Institute (HTI) for one year before coming to TCC. According to a written certification from HTI, she did not receive any Title IV aid there.

The financial aid administrator checks Elena's previous spring-semester academic transcript and finds that she has completed 38 credits with a GPA of 2.8, which surpasses the school's satisfactory academic progress standards. Elena's Expected Family Contribution (EFC) is less than the cost of attendance (COA) for her program. She is not eligible for the Federal Pell Grant Program. Elena was not selected for verification.

Elena's Questions:

- 1. Am I eligible to receive Title IV financial at TCC?**

- 2. If not, which student eligibility criteria did I not meet and what can I do, if anything, to become eligible for Title IV financial aid?**

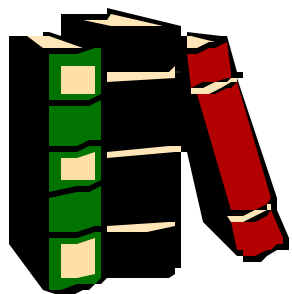
Student 4—Jacques

Jacques Bertrand is a 27-year-old student enrolled at the World Language Institute (WLI). He is in a conversational English course for 3 credits that he's taking to better communicate with customers in his current job.

Jacques and his family came to the U. S. in 1996 from France. Jacques has received his Student Aid Report (SAR) with a Pell-eligible Expected Family Contribution (EFC) and has delivered it to the financial aid administrator. His SAR indicates that the Central Processing System (CPS) did not confirm him to be an eligible noncitizen, and WLI is in the process of further reviewing his citizenship status. His SAR also shows that he was selected for verification, and Jacques delivered all appropriate documents to verify the information reported on his application for financial aid.

Jacques' Questions:

- 1. Am I eligible to receive Title IV financial aid at WLI?**
- 2. If not, which student eligibility criteria did I not meet, and what can I do, if anything, to become eligible for Title IV financial aid?**



Resources Resources

★ *The 1999-00 Federal Student Financial Aid Handbook: Student Eligibility*

★ 34 CFR Subpart C-Student Eligibility
668.32 – 668.39

★ 34 CFR Subpart E- Verification
668.51 – 668.61

Answer



Key

Case Study:

Justin

He is NOT eligible because:

#5 – he is not registered with the Selective Service, and

#13 – verification was not yet completed

Kay C

She is NOT eligible because:

#3 – she is not enrolled as a regular student in an eligible program

Elena

She IS eligible.

Jacques

He is NOT eligible because:

#2 – he has not documented his citizenship status

#3 – he is not enrolled for the purpose of obtaining a degree or certificate